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February 1, 2022

By ECF

Honorable Denise Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Crystal Cruz v. City of New York, et al.
21 cv 1999 (DLC)

Dear Judge Cote:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel for the City of New York, attorney for Defendants City of New York, New York Health and Hospitals Corporation, Nicole Phillips, Dana Stein, and Blanche Greenfield in the above-referenced action. I write on behalf of both parties, to respectfully and jointly submit this request to adjourn the Initial Pretrial Conference presently scheduled for February 4, 2022, until April 1, 2022, or a date thereafter that is convenient to the Court, and a concomitant stay in discovery. The parties make this request because we seemed to make good progress at the January 28, 2022 mediation led by Leslie Salzman Esq. Ms. Salzman adjourned further mediation until March 25, 2022 to give the parties additional time to discuss potential settlement. The parties respectfully propose that we be given the opportunity to report to the Court on or before March 29, 2022 as to the status of any potential settlement. This is the parties' first request for an adjournment of the conference and discovery. The adjournment does not affect any other scheduled dates.

Accordingly, both parties respectfully and jointly request that the Court adjourn the February 4, 2022 initial conference and stay discovery, pending the parties report to the Court on March 29, 2022. Thank you for your consideration of these requests.

*The conference is adjourned
to 4/1/22 at 10:00 am.
Denise Cote
2/1/22*

Respectfully submitted,

/s/ Jack B. Greenhouse

Jack B. Greenhouse
Assistant Corporation Counsel

cc: Anne C. Leahey, Attorney for Plaintiff, Crystal Cruz (By ECF)